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8                   **UNITED STATES DISTRICT COURT**  
9                   **NORTHERN DISTRICT OF CALIFORNIA**  
10                  **OAKLAND DIVISION**

11 Abdi Nazemian, et al.,  
12                         Plaintiffs,  
13                         vs.  
14 NVIDIA Corporation,  
15                         Defendant.

16 Case No. 4:24-cv-01454-JST  
17 Case No. 4:24-cv-02655-JST

18                   **JOINT STIPULATION AND {PROPOSED}**  
19                  **ORDER RE ESI PROTOCOL AND**  
20                  **PROTECTIVE ORDER SCHEDULE**

21 Judge: Hon. Jon S. Tigar  
Courtroom: 6 - 2nd Floor

22 Andre Dubus III, et al.,  
23                         Plaintiffs,  
24                         vs.  
25 NVIDIA Corporation,  
26                         Defendant.

27  
28 Case No. 4:24-cv-01454-JST  
Case No. 4:24-cv-02655-JST

29                   **JOINT STIPULATION AND {PROPOSED} ORDER RE CASE SCHEDULE**

1 Pursuant to Civil Local Rule 7-12 and the Court's Minute Entry for proceedings held on October  
2 21, 2024, (ECF No. 80), the undersigned Parties to the above-captioned action, by and through their  
3 respective counsel of record, hereby stipulate the following:

4 1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar  
5 for an Initial Case Management Conference, (ECF No. 66);

6 2. WHEREAS, on September 9, 2024, the Court ordered the Parties to meet and confer on a  
7 proposed protective order and ESI protocol order, and established a schedule and requirements for  
8 submitting briefs if Parties could not reach agreement, (ECF No. 68);

9 3. WHEREAS, the Parties submitted their respective ESI protocol and protective order  
10 proposals and accompanying briefs on September 9, 2024, (ECF Nos. 73, 74), and responses and  
11 supplemental submissions thereafter (ECF Nos. 75, 76, 79);

12 4. WHEREAS, on October 21, 2024, the Parties appeared before the Court to present  
13 arguments regarding their respective ESI protocols and protective order proposals (ECF No. 80);

14 5. WHEREAS, the Court directed the Parties to further meet and confer to resolve disputed  
15 issues in their respective ESI protocol and protective order proposals, and to submit a stipulation or  
16 competing proposals with accompanying briefs by November 4, 2024, (ECF No. 80);

17 6. WHEREAS, the Parties have engaged in multiple meet and confer conferences and  
18 exchanged redlined drafts of the ESI protocol and protective order proposals since October 21, 2024, and  
19 have made significant progress toward narrowing the disputed issues in the respective proposals;

20 7. WHEREAS, the Parties believe that they can make additional progress by continuing to  
21 meet and confer on the remaining disputed issues.

22 NOW, THEREFORE IT IS HEREBY STIPULATED, by and between the Parties and their  
23 respective counsel, that the Parties' deadline to submit a stipulation, or competing proposed ESI  
24 Protocols, Protective Orders, and supportive briefs not to exceed 5 pages, shall be extended from  
25 November 4, 2024, to November 14, 2024.

Dated: November 4, 2024

Respectfully submitted,

By: /s/ Joseph R. Saveri

Joseph R. Saveri (SBN 130064)  
Christopher K.L. Young (SBN 318371)  
Elissa A. Buchanan (SBN 249996)  
Evan Creutz (SBN 349728)

**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: [jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)  
[cyoung@saverilawfirm.com](mailto:cyoung@saverilawfirm.com)  
[eabuchanan@saverilawfirm.com](mailto:eabuchanan@saverilawfirm.com)  
[ecreutz@saverilawfirm.com](mailto:ecreutz@saverilawfirm.com)

Matthew Butterick (SBN 250953)  
1920 Hillhurst Avenue, #406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
[mb@buttericklaw.com](mailto:mb@buttericklaw.com)

Brian D. Clark (admitted *pro hac vice*)  
Laura M. Matson (admitted *pro hac vice*)  
Arielle Wagner (admitted *pro hac vice*)  
Eura Chang (admitted *pro hac vice*)  
**LOCKRIDGE GRINDAL NAUEN PLLP**  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612)339-6900  
Facsimile: (612)339-0981  
[bdclark@locklaw.com](mailto:bdclark@locklaw.com)  
[lmmatson@locklaw.com](mailto:lmmatson@locklaw.com)  
[aswagner@locklaw.com](mailto:aswagner@locklaw.com)  
[echang@locklaw.com](mailto:echang@locklaw.com)

*Attorneys for the Nazemian Plaintiffs and the Proposed Class*

1 Dated: November 4, 2024

Respectfully submitted,

2 By: /s/ Bryan L. Clobes  
 3 Bryan L. Clobes (admitted *pro hac vice*)  
 4 Alexander J. Sweatman (admitted *pro hac vice*)  
 5 Mohammed Rathur (admitted *pro hac vice*)  
**6 CAFFERTY CLOBES MERIWETHER  
 & SPRENGEL LLP**  
 7 135 South LaSalle Street, Suite 3210  
 8 Chicago, IL 60603  
 Tel: 312-782-4880  
 bclobes@caffertyclobes.com  
 asweatman@caffertyclobes.com  
 mrathur@caffertyclobes.com

9 David A. Straite (admitted *pro hac vice*)  
**10 DiCELLO LEVITT LLP**  
 11 485 Lexington Avenue, Suite 1001  
 12 New York, NY 10017  
 Tel. (646) 933-1000  
 dstraite@dicellosevitt.com

13 Amy E. Keller (admitted *pro hac vice*)  
 14 Nada Djordjevic (admitted *pro hac vice*)  
 15 James A. Ulwick (admitted *pro hac vice*)  
**16 DiCELLO LEVITT LLP**  
 17 Ten North Dearborn Street, Sixth Floor  
 18 Chicago, Illinois 60602  
 Tel. (312) 214-7900  
 akeller@dicellosevitt.com  
 ndjordjevic@dicellosevitt.com  
 julwick@dicellosevitt.com

19 Brian O'Mara (SBN 229737)  
**20 DiCELLO LEVITT LLP**  
 21 4747 Executive Drive  
 22 San Diego, California 92121  
 Telephone: (619) 923-3939  
 Facsimile: (619) 923-4233  
 briano@dicellosevitt.com

23  
 24 *Counsel for the Dubus Plaintiffs and Proposed Class*

1 Dated: November 4, 2024

Respectfully Submitted,

2 By: /s/ Sean S. Pak

3 **QUINN EMANUEL URQUHART &**  
4 **SULLIVAN, LLP**  
5 Sean S. Pak (SBN 219032)  
6 seanpak@quinnmanuel.com  
7 50 California Street, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700

8 Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnmanuel.com  
9 191 N. Wacker Drive, Suite 2700  
10 Chicago, Illinois 60606  
11 Telephone: (312) 705-7400  
Facsimile: (312) 705-4001

12 Alex Spiro (admitted *pro hac vice*)  
alexspiro@quinnmanuel.com  
13 51 Madison Avenue, 22nd Floor  
14 New York, NY 10010  
15 Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

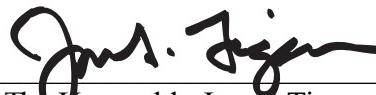
16 *Attorneys for Defendant NVIDIA Corporation*

1                   **{PROPOSED} ORDER**

2                   Pursuant to the stipulation of the Parties, and for good cause appearing, it is hereby ORDERED  
3                   that the Parties deadline for filing a stipulated ESI Protocol and stipulated Protective Order, or filing the  
4                   Parties' respective proposals and briefs shall be continued to November 14, 2024.

5                   **IT IS SO ORDERED.**

6                   Dated: November 5, 2024

  
The Honorable Jon S. Tigar  
U.S. District Court Judge

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: November 4, 2024

/s/ Bryan L. Clobes

Bryan L. Clobes